vard H. McNamara

County Executive

April 11, 1988

WAYNE COUNTY

WASTE MANAGEMENT DIV.

RECEIVED

DPR 1 4 1988

VERNICE DAVIS-ANTHONY, MPH Health Officer

DONALD LAWRENCHUK, M.D., MPH Medical Director

Mr. Terry Filipiak Environmental Specialist Mazda Motor Manufacturing (USA) Corporation 22000 Gibraltar Road Flat Rock, Michigan 48134

RE: MID 981953912 - Land Disposal Restriction Inspection

Dear Mr. Filipiak:

On April 7, 1988, an inspection was conducted at your facility located at 22000 Gibraltar Road, Flat Rock. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

40 CFR 268.7 This section requires the generator to provide the TSD facility notification/certification with each shipment of F001-F005 solvent waste.

Certification/notification not provided; submit the required information, as the sample form left during the inspection provides, with each shipment.

We request your response by May 11, 1988, documenting your corrective actions taken to these violations.

If you have any questions, please contact me at 326-4900.

Sincerely,

Gerald B. Schwartz

Hazardous Waste Management Section

cc: Michigan Department of Natural Resources District Office V ENVIRONMENTAL HEALTH DIVISION

3669 Metro Place Mall Wayne, Michigan 48184 Telephone: (313) 326-4900

#### RCRA LAND DISPOSAL RESTRICTION INSPECTION

| Facility:   | Mazda   | Motor Ma   | nutratur   | ing (usA) Corp   | orati                |
|-------------|---|--|--|--|----------------------|
| U.S. EPA I. | D. No.:   | 17D 981  | 953 917  |  |                      |
|             | ,   | O GIAM   |  |  |                      |
| City: F     | Pat Rock  | . State:   | Nt.  | Zip Code: <u>48/</u>   | 34                   |
| Telephone:  | ·   | 782-779  | 7  |  | ¢                    |
| Operator:   |   |  | **************************************   | and the second s |                      |
| Street      | والمستعدد | aga mara mara hakadi limbal aga ga ga ga ga ga kada maha mara kada kada kada kada kada kada kada k   |  |  |                      |
| City:       | · ·   | _ State: _   |  | Zip Code:  |                      |
| Telephone:  |   |  | en e   | Darley Control of the | mgm.***F+mill*       |
| Owner:      |   |  |  |  | e paga-ti in a santa |
| Streeti     |   | • The state of the |  |  | ·                    |
| City:       |   | State:   |  | Zip Code:  |                      |
| Telephone   |   |  | 77777777   |  |                      |
| Inspection  | Date: 41718   | Time: 10:30-14   | 30 Weather Co  | nditions: <u>Clear</u>   |                      |
|             | Name  |  | iation   | Telephone  |                      |
| Inspectors  | : G,B.50  | hwartz -u  | CHO-   | 376-4900   |                      |
| Facility R  | epresentatives:   | Terry  | i Filipia  | 4  |                      |
|             |   | RCRA Status  | F-Solvent  | LDR Status California List   |                      |
|             | Generator   |  | de la  |  |                      |
|             | Transporter   | Control of the second of the s | Se the second section of the section of the second section of the section of the second section of the section  |  |                      |
| <u>.</u>    | Treater   | Care the second  | Special Control of the Control of th | r  |                      |
|             | Storer  | Carean Ca | Silver to the second se | Control of the Contro |                      |
| g. gat      | Disposer  | · Carrachini in the separate and provide the separate sep |  | the state of the s |                      |

#### INSPECTION SUMMARY

# RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

|    |            | •           |                                | Gen. | Treat  | Store                      | Disp.                            | Trans.   |
|----|------------|-------------|--------------------------------|------|--|----------------------------|----------------------------------|--|
| A. | F-So       | ivent Waste | : <u>s</u>                     |      |  |                            |                                  |  |
|    | 1.         | F001        |                                |      | emesmatistis planta de la companya d | 4227-LAND FARENCE HERCHAND | CONTRACTOR OF CONTRACTOR         | WAS THE STATE OF T |
|    | 2.         | F002        |                                |      | ATTENDED AND PARKET  | C-22017                    | ESS-Advantage Science Str.       |  |
|    | <b>3</b> . | F003        |                                |      |  |                            | <b>(</b>                         | 4  |
|    | 4.         | F004        |                                |      | <del></del>  | •                          | Gaster to the contraction to the | distant of the second  |
|    | 5.         | F005        | •                              |      | 6007000  | 42447-327-                 | <del></del>                      | <u> </u>   |
|    |            | Note:       | Use Appendix<br>misclassifying |      |  | her the fac                | cility is                        |  |

#### B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

|             |          | Gen.  | Treat                           | Store  | Disp.  | Trans.  |
|-------------|----------|---|---------------------------------|--|--|---|
| Arsenic     | 500 mg/L | -   | <del></del>                     | финализичник.  | Atta-rotor   | <del></del>   |
| Cadmium     | 100 mg/L |   | <del>Constitutions of the</del> | Commence of the state of the st | CECCOMPER L  | Có-recursor   |
| Chromium VI | 500 mg/L | Designation of the second   | 400-44                          | AUGUSTA AUGUSTA  | Car area ampana  | <del>,</del>  |
| Lead        | 500 mg/L | <del></del>   |                                 | المحمد  | WATER CONTRACTOR OF THE PARTY O | <del></del>   |
| Mercury     | 20 mg/L  |   | · ·                             | para care of the same of the s |  |   |
| Nickel      | 134 mg/L | With the state of | <del>(11.181)</del>             |  | <del></del>  | <del></del>   |
| Selenium    | 100 mg/L | Decrease  | *************                   | guarante anno anno anno anno anno anno anno ann  |  | g   |
| Thallium    | 130 mg/L | Commence  |                                 |  | <b></b>  | CONTRACTOR AND ADDRESS OF THE PERSON OF THE |

| 2. | Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L                              |
|----|--|
|    | Gen. Treat Store Disp. Trans.  |
| 3. | Liquid hazardous waste that has a pH of less than or equal to 2.0  |
| 4. | Liquid hazardous waste that contains PCBs at concentrations greater than or equal to  50 ppm  500 ppm  Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes? |
| 5. | Yes No NA  If yes, state reasons for mixing:  Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less           |
|    | Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.                                       |

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

### GENERATOR CHECKLIST

| f yes     | check the appropriate fastewaters containing y weight) harmaceutical wastew pent methylene chloricall other spent solvent  | p of the w  fes  treatabili  solvents (  ater contain  ie  wastes  | No No group.   | ]   | NA   |
|-----------|--|--|--|---|--|
| Callif    | check the appropriate fastewaters containing y weight) harmaceutical wastew pent methylene chloricall other spent solvent  | treatabili<br>solvents (<br>ater contai<br>ie<br>wastes  | ry group.<br>iess than or  | State of the comments and a   |  |
| Callif    | Vastewaters containing y weight) harmaceutical wastew pent methylene chloricall other spent solvent  | solvents (<br>ater contain<br>ie<br>wastes   | less than or   | equal to  | 1% TOC   |
| Calif     | y weight) harmaceutical wastew pent methylene chloric ill other spent solvent rnia List Wastes: Does   | ater contai<br>ie<br>wastes  |  | equal to  | 1% TOC   |
| Calif     | rnia List Wastes: Does   |  |  |   |  |
|           |  | - 1  |  |   |  |
|           | propriate treatment st   |  |  |   | ine  |
| <b>a.</b> | concentrations greater<br>500 ppm, is the treatme<br>existing TSCA thermal<br>curning in high efficion   | than or eq<br>ent in acco<br>treatment<br>ency boiler  | ual to 50 b<br>ordance with<br>regulation  | ut less<br>h<br>s for   |  |
|           | Стай-патей ангализация   | Y'es _   | No   |   | NA   |
|           | if yes, specify the met  | hod:   |  |   | AU 1101  |
| ъ.        | concentrations greater<br>the waste incinerated  | than or ed<br>or disposed  | ual to 500 i of by oth   | ppm, is<br>er   | y.   |
|           | dia  | Yes .  | No   |   | NA   |
|           | submitted a written re<br>Administrator or Assis   | equest to the stant Admi   | ne Regiona<br>inistrator f   | l<br>or an  | lity has   |
|           | The state of the s |  |  |   | ·  |
|           | b.   | concentrations greater 500 ppm, is the treatment of the existing TSCA thermal burning in high efficience incineration (40 CFR).  If yes, specify the met  b. For liquid hazardous of concentrations greater the waste incinerated approved alternate met  If yes, specify the met submitted a written readministrator or Assistance. | concentrations greater than or eq 500 ppm, is the treatment in acceexisting TSCA thermal treatment burning in high efficiency boiler incineration (40 CFR 761.70)?  Yes  If yes, specify the method:  b. For liquid hazardous waste that concentrations greater than or expected the waste incinerated or disposed approved alternate methods (40 CYes  If yes, specify the method and so submitted a written request to the Administrator or Assistant Administrator or Assistant Administrator or Assistant Administrator and the second expectations are submitted as written request to the Administrator or Assistant Administrato | concentrations greater than or equal to 50 b 500 ppm, is the treatment in accordance wit existing TSCA thermal treatment regulation burning in high efficiency boilers (40 CFR incineration (40 CFR 761.70)? YesNo  If yes, specify the method:  b. For liquid hazardous waste that contains PC concentrations greater than or equal to 500 the waste incinerated or disposed of by oth approved alternate methods (40 CFR 761. 60  YesNo  If yes, specify the method and state whethe submitted a written request to the Regional Administrator or Assistant Administrator f | concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?  Yes No  If yes, specify the method:  b. For liquid hazardous waste that contains PCEs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))? |

| 70 | 337          | . b    | GEN .  |
|----|--------------|--------|--|
| B. | 14.52        | te An: | <u> </u>   |
|    | 1.           | F-So   | lvent Wastes   |
|    |              | 6.     | Does the generator determine whether the F-solvent waste exceeds treatment standards?  |
| i  |              | •      | Yes No NA  |
|    |              |        | How was this determination made?   |
|    |              |        | - Knowledge of waste   |
|    |              |        | Yes No   |
|    |              |        | If yes, note how this is adequate: by abound make up<br>and MOD and by process knowledge.  |
|    |              |        | - TCLP Yes No  |
|    |              |        | discommissions - emissions - emissions - emissio |
|    |              |        | If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.   |
|    |              |        |  |
|    |              | ъ.     | Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?   |
|    |              |        | Yes No NA  |
|    |              |        | If yes, specify the waste stream: 24 here Toluene  |
| •  |              | c.     | Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?  |
|    |              |        | Yes No NA  |
|    |              | d.     | How does the generator test F-solvent waste when a process or waste stream changes?  |
|    |              |        | morphoss Manger Usil   |
|    |              |        |  |
|    |              |        | 6<br>  |
|    | ş. <b>2.</b> | Ca     | lifornia List Wastes   |
|    |              | 2.     | Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as  |
|    |              | s      | described by SW-846?   |

Yes \_\_\_ No \_\_\_ NA

|         |    | is an absorbent added to the waste?   |
|---------|----|---|
| ŕ       |    | Yes No N <sub>i</sub> A   |
|         |    | What type of absorbent is used?  Check the types of waste to which absorbent is added.  Liquid hazardous waste having a pH less     |
|         |    | than or equal to 2  |
|         |    | Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L             |
|         |    | Liquid hazardous waste containing metals  |
| ş.      |    | Liquid hazardous waste containing free cyanides   |
|         | C. | extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 |
|         |    | based on:   |
|         |    | - Knowledge of wastes   |
|         |    | Yes No NA   |
|         |    | If yes, note how this is adequate:  |
|         |    |   |
|         |    | - Testing Yes No NA   |
|         |    | If yes, list test method used:  |
|         | d. | Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?                |
| ,       |    | Yes No NA   |
|         |    | - If yes, list test method used and constituent and concentration levels that exceeded prohibition levels:                          |
| ń       |    |   |
|         | ¢. | Does the generator dilute the waste as a substitute for adequate treatment [268.3]?   |
| ۔ سے دع |    | Yes No NA   |

| <u>Man</u> | <u> बहुदमा ह</u>   | <u>vi t</u>  |
|------------|--------------------|--|
| graph e    | On-S               | ite Management   |
|            | or di              | ste that exceeds the treatment standards treated, stored, sposed on-site? YesNo                                      |
|            | If ye              | s, the TSD Checklist must be completed.  |
| 2          | Off-               | Site Management  |
|            | <b>&amp;.</b><br>· | Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility? |
|            |                    | Yes No   |
|            |                    | If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?                  |
|            |                    | Yes No   |
|            |                    | If yes, does notification contain the following?   |
|            |                    | EPA Hazardous waste number(s) Yes No   |
|            |                    | Applicable treatment standards Yes No  |
|            |                    | Manifest number Yes No   |
|            |                    | Waste analysis data, if available Yes No   |
|            |                    | Identify off-site treatment or storage facilities: Invitar montal Waste  |
|            | ъ.                 | Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?               |
|            |                    | Yes No   |
| ٠.         |                    | If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?            |
|            |                    | Yes No   |

C.

|    |             | If yes, does notification contain the follower  | owing?  | •  |
|----|-------------|---|---|--|
|    |             | EPA Hazardous waste number(s)   | CONTRACTOR OF THE STATE OF THE | · NO   |
|    |             | Applicable treatment standards  |   | MO   |
|    |             | Manifest number   | Yes   | No.  |
|    |             | Waste analysis data, if available   | emmorrer emmorrer   | No   |
|    |             | Certification that the waste meets treatment standards  | **************************************  | No   |
|    |             | Identify off-site land disposal facilities:   |   |  |
|    |             |   |   | the STATE of the STATE and STATE and STATE are also become and the substitute of the STATE of th |
|    |             | (e.g., solvent-water mixtures less than 19 (268.5), or petition (268.6), does the gene provide notification to the off-site dispethat the waste is exempt from land disperstrictions [268.7(a)(3)]? | erator<br>osal facility<br>osal   |  |
|    | ,           | Yes   | io i  | AP   |
| D. | (i.e., boil | nt Using RCRA 264/265 Exempt Units or ers, furnaces, distillation units, wastewate at tanks, elementary neutralization, etc.)   |   |  |
| ì  | Are         | e treatment residuals generated from units<br>der RCRA 264/265?YesN   |   | cempt  |
|    | If :        | yes, list types of waste treatment units and  | d processes:  |  |
|    |             |   |   |  |
|    |             |   |   |  |